

Robert M. Brown, Director Water Resource Regulation Department

**February 9, 2011** 

## Chronology



- July 2008 Initial Board briefing on UMAM
- 2008/2009 Coordination meetings and teleconferences with Audubon; FDEP also included
- May December 2010 UMAM Field Training
- September 2010 Update to the Board
- September 30, 2010 Interagency meeting with other districts and FDEP
- November 2010 Receipt of Audubon report on analysis of District's use of UMAM
- February 2011 Update to the Board

### **Use of UMAM for wetland assessments**



- UMAM is a framework for assessing wetland functions using reasonable scientific judgment
- UMAM rule mandated by state law and developed by FDEP for use by all state/local agencies
- Any guidance documents must come from FDEP and not the District
- Older mitigation banks may have used other assessment methods (WRAP/WATER) that are allowed under UMAM rule

## Rule provisions to consider



- UMAM does not require functions to be measured or mitigated individually
- UMAM score sheets are in the rule. Other scoring requirements cannot be imposed.
- UMAM allows for other habitat types as mitigation if they are similar in function or will provide greater long-term benefit
- UMAM was modified in 2007 to better reflect the review of "native community type the site most closely resembles"
- Upland preservation/enhancement in conjuntion with wetlands is allowed; will result in less than 1:1 wetland replacement

### **Concerns with Audubon recommendations**



- Mitigation banks generally support a mosaic of habitats including uplands. If bank credits are broken down to FLUCCS codes, diversity would be lost and no uplands would be included
- Proposed water storage tracking sheets; require separate data collection & calculation of this function
- Assumes only short or long hydroperiod wetlands with 6 month break point – not accurate; need at least three categories
- Does not consider that many wetlands are combination of habitats (lumpers vs splitters for reporting purposes)

# **Areas of Agreement with Audubon**



- Ongoing Internal/External UMAM training sessions conducted – more planned each year
- Use of more descriptive Florida Land Use Classification Codes System (FLUCCS) – ensure accurate data entry
- Ensure impacts to surface waters which provide habitat for listed wetland dependent species are coordinated with wildlife agencies for appropriate mitigation measures
- Database tracking of hydroperiod types for wetland impacts can be done if we agree on definitions; requires programming resources (unbudgeted)

#### Conclusion



- District has considered Audubon's proposals and will continue ongoing training for staff and the regulated public to ensure consistency
- District is open to implementing database tracking of hydroperiod types once programming resources are budgeted
- Coordinated with other Districts and FDEP on Audubon's concerns. No changes to UMAM to be proposed at this time.
- Any changes to UMAM would need to be pursued through legislature and FDEP; requires statewide applicability/implementation.